

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR LATE ACCEPTANCE OF RESPONSES OF WITNESS CAMPBELL  
TO KEYSpan INTERROGATORIES  
(April 11, 2000)

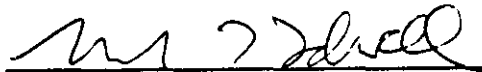
The United States Postal Service hereby moves that it be permitted to file five calendar days late the responses of witness Campbell to the following interrogatories of KeySpan Energy: KE/USPS-T29-50, 51(a-h,j), 52(a-d). These responses were due to have been filed on April 6<sup>th</sup>. The press of other discovery obligations made it impossible for witness Campbell to prepare these responses within the prescribed 14-day time limit. The Postal Service considers that no party will be prejudiced by the filing of the responses today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking




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April 11, 2000

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Michael T. Tidwell

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